

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

THE ANNUITY, PENSION, WELFARE and APPRENTICESHIP SKILL IMPROVEMENT AND SAFETY FUNDS of the INTERNATIONAL UNION OF OPERATING ENGINEERS, LOCAL 137, 137A, 137B, 137C & 137R, AFL-CIO, by its TRUSTEES EDWARD KELLY, JEFFREY LOUGHLIN, PETER PATERNO, ROSS PEPE, NICHOLAS SIGNORELLI and NICHOLAS SIGNORELLI, JR., and JOHN and JANE DOE as Beneficiaries of the ANNUITY, PENSION, WELFARE and APPRENTICESHIP SKILL IMPROVEMENT AND SAFETY FUNDS of the INTERNATIONAL UNION OF OPERATING ENGINEERS, LOCAL 137, 137A, 137B, 137C & 137R, AFL-CIO,

**NOTICE OF
MOTION FOR
DEFAULT JUDGMENT**

07-CIV-3423 (SCR)

Plaintiffs,

-against-

J.E.P. CONSTRUCTION, INC.,

Defendant.

X

PLEASE TAKE NOTICE, that upon the Affidavit of JAMES M. STEINBERG, ESQ., sworn to on the 16th day of July, 2007, Plaintiffs' Statement of Damages, and upon all of the prior papers and proceedings heretofore served and had herein, Plaintiffs, by their attorneys BRADY McGUIRE & STEINBERG, P.C., will move this court, at the United States Courthouse located at 300 Quarropas Street, White Plains, New York, before the Honorable Stephen C. Robinson, at a date and time to be set by the Court, for a judgment of default against Defendant J.E.P. CONSTRUCTION, INC. pursuant to Rule 55(a) of the Federal Rules of Civil

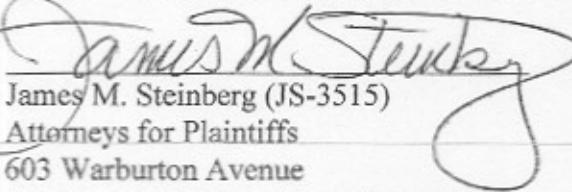
Procedure in the amount of \$44,017.06, together with such other and further relief as this Court may deem just, proper and equitable.

Dated: Hastings-on-Hudson, New York
July 16, 2007

Respectfully submitted,

BRADY McGUIRE & STEINBERG, P.C.

By:


James M. Steinberg (JS-3515)
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(914) 478-4293

TO: J.E.P. CONSTRUCTION, INC.
115 Austin Avenue
Yonkers, New York 10710

J.E.P. CONSTRUCTION, INC.
P.O. Box 120
Congers, New York 10920